

East Tennessee Information & Referral, Inc. Fax: 865-577-3708

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Friday, December 23, 2005

Board of Directors

Board Chair Charles Gray

Treasurer Gary Young

Directors: Jenniser Carpenter Marion Ferrill Ivan Harmon Kathy Hatfield Russ Jensen **Rusty Seymour** Ann Staup Jenni Wylie

Advisors: Charles Finn Dwight Van de Vate Tennessee Regulatory Authority Attn: Chairman Ron Jones 460 James Robertson Parkway Nashville, TN 37243-0505

RE: Petition of Helping Hands Home Assistance, Inc. for 211 Utility Allocation in East Tennessee (Docket 05-00141)

Dear Chairman Jones,

Please find enclosed for filing an original and 14 copies of Tennessee Alliance of Information & Referral Systems Petition to Intervene. Please date stamp one copy for my records.

Thank you for your assistance in this matter. If I may be of assistance please do not hesitate to contact me at 865 -374-0453.

Sincerely,

Gary Young, Chair

East Tennessee Information and referral

PO Box 33002

Knoxville, TN 37930



BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

December 22, 2005

OCKET NO.
5-00141

PETITION OF EAST TENNESSEE INFORMATION & REFERRAL FOR LEAVE TO INTERVENE

East Tennessee Information & Referral ("ETI&R") hereby petitions the Tennessee Regulatory Authority ("Authority") for leave to intervene pursuant to Tenn. Code *Ann.* § 4-5-3 10 (2005), Tenn. Code *Ann.* §65-2-107 (2004), and Tenn. Comp. R. & Regs. 1220-1-2-.08 (2005) in the referenced proceeding.

In support of this petition, ETI&R respectfully states the following

- 1. ETI&R is a charitable not for profit corporation. ETI&R's principle place of business is in Knoxville, Tennessee. ETI&R has been designated the 2-1-1 provider for Knox County and all contiguous counties in East Tennessee. ETI&R is a member of TNAIRS, the state 2-1-1 Collaborative.
- 2. TNAIRS has proposed a Plan for Statewide Coverage and it has been filed with this Authority in docket number 04-00342 "PETITION OF EAST TENNESSEE INFORMATION & REFERRAL FOR 2-1-1 STATEWIDE COVERAGE." Said Petition provides for the provision of 2-1-1 service for the entire State of Tennessee, including the counties outlined in paragraph 3 below.
- 3. ETI&R has become aware of an application of Helping Hands Home Assistance (HHHA), which seeks 2-1-1 Designation in eight counties in East Tennessee: Campbell, Claiborne, Cocke, Hamblen, Hancock, Monroe, Morgan, and Scott Counties.
- 4. ETI&R has a direct interest in how 2-1-1 service is provided and believes HHHA does not have the experience or ability to provide quality information & referral through the 2-1-1 dialing code. Further, ETI&R believes that a statewide approach to the provision of 2-1-1 is the most efficient and practicable way to provide this very important service and that HHHA's application or petition should be dismissed in favor of TNAIRS statewide plan.
- 5. ETI&R moves to intervene in this matter in order to insure that its interests are represented as the 2-1-1 Designee in Knox and contiguous counties.
- 6. ETI&R believes its Petition for Intervention is warranted and is being filed more than seven (7) days prior to the hearing of this matter.
 - 7. The Petitioner's participation will not impair the interests of justice or the

orderly prompt conduct of the Authority's proceeding.

WHEREFORE, ETI&R respectfully requests that it be granted leave to intervene and participate in this proceeding with all attendant rights and responsibilities, including but not limited to the right to participate in any and all pre-hearing conferences, to produce and cross examine witnesses, to seek data requests and other discovery, and to file motions, briefs, testimony, and/or comments in order to assist the Authority's deliberations and otherwise protect the interests of ETI&R and the public interest.

Additionally, Petitioner requests to receive copies of any notices, orders or any other documents filed herein, and have such other, further and general relief as the justice of their cause entitles them to receive.

Respectfully submitted,

Hary Young

Gary Young

Board President

East Tennessee Information & Referral

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